



# Department of Toxic Substances Control



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February 26, 2001

Mr. Dean Gould  
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Base Realignment and Closure  
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## SUMMARY REPORT FOR AERIAL PHOTOGRAPH ANOMALY APHO 44, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above document dated November 3, 2000. The report presents the results of the record search activities, visual inspection and geophysical survey of APHO 44 (also referenced as Science Applications International Corporation (SAIC) 288). APHO 44 was identified on an aerial photograph dated December 9, 1974. APHO 44 was described as disturbed ground, mounded material and a probable trench in an area of approximately 2 acres; however, the APHO 44 investigation area was increased to approximately 9 acres to include adjacent construction debris observed during the field inspection. APHO 44 is located west of Installation Restoration Program (IRP) Site 17, approximately 700 feet southeast of the intersection of Perimeter Road and Quarry Road.

After review of the report, DTSC has the following comments:

1. The geophysical survey conducted at APHO 44 identified several areas of surface and subsurface construction (concrete and metal) debris. The debris found within the APHO 44 investigation area appears to be similar to the debris found at the southern end of IRP Site 17.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

The report recommends that the debris associated with APHO 44 be managed during the planned consolidation activities at Site 17.

Based on information presented at the Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting held on January 31, 2001, DTSC understands that the Department of the Navy (DON) intends to conduct a supplemental investigation at APHO 44. The purpose of the investigation is to confirm the waste limits APHO 44. The investigation should also include verification that the surface and subsurface debris associated with APHO 44 is consistent with the construction debris associated with IRP Site 17.

2. Additionally, the report recommends a status of no further action for APHO 44.

The selected remedy for Site 17 is documented in the *Final Interim Record of Decision, Operable Unit 2B, Landfill Sites 2 and 17, Marine Corps Air Station, El Toro, California* (Interim ROD) (Bechtel National, Inc., April 2000). The remedy for Site 17 includes consolidation of construction debris from Areas B and into the operational landfill unit prior to capping. Since an Interim ROD that includes Site 17 has been signed, consolidation of the APHO 44 debris will need to be included in the Final ROD that is planned for Sites 2 and 17 or as a post-ROD change to the Interim ROD for Sites 2 and 17.

As a result, DTSC does not concur with the recommended status of no further action for APHO 44 until the proposed management of the site with remedial activities for Site 17 is properly documented in the Final ROD or as a post-ROD change to the Interim ROD for Sites 2 and 17.

3. The report also recommends that the description for APHO 44 in the next update of the BRAC Business Plan be expanded as follows: "APHO 44 (identified as SAIC 288 on a photograph dated 9 December 1979) is described as disturbed ground, mounded material, and probable trench located west of IRP Site 17."

DTSC concurs with the recommendation to revise the description of APHO 44 in the next update of the BRAC Business Plan.

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If you have any questions, please contact me at (714) 484-5395.

Sincerely,



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## TRANSMITTAL

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Note: APHO 44 is located within part of  
IRP Site 17.